

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division

DR. ROBERT W. MALONE,

Plaintiff,

v.

PETER R. BREGGIN, MD,
GINGER ROSS BREGGIN,
AMERICA OUT LOUD,
DR. JANE RUBY

-and-

RED VOICE MEDIA,

Defendants.

Case No. 3:22-cv-63

**UNOPPOSED MOTION TO
EXTEND THE RESPONSE DEADLINE TO
PLAINTIFF’S AMENDED COMPLAINT (DKT. 37)**

Defendant, Dr. Jane Ruby (“Dr. Ruby”), through counsel and subject to the approval of this Court, files this *Unopposed Motion to Extend the Response Deadline to Plaintiff’s Amended Complaint (Dkt. 37)*, and in support thereof, respectfully shows the Court as follows:

Plaintiff filed his Amended Complaint on June 29, 2023, making Dr. Ruby’s deadline to respond July 13, 2023. Dr. Ruby requests that the time to respond to Plaintiff’s Amended Complaint be extended until July 20, 2023. This request is not made for the purpose of delay or prejudice and Plaintiff is not opposed to this request.

Accordingly, Defendant Dr. Jane Ruby respectfully requests that the Court issue the attached proposed order extending Defendant Dr. Jane Ruby’s time to respond to the Amended Complaint to July 20, 2023.

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel for Defendant, Dr. Jane Ruby, conferred with counsel for Plaintiff about the issues presented here. Counsel for Plaintiff indicated that he was not opposed to the relief sought herein.

Dr. Jane Ruby

By Counsel

MERRITTHILL, PLLC

/s/ R. Braxton Hill, IV

R. Braxton Hill, IV (VSB No. 41539)
Craig Thomas Merritt (VSB No. 20281)
919 E. Main Street, Suite 1000
Richmond, VA 23219
Telephone: 804.916.1600
E-mail: bhill@merrittfirm.com
E-mail: cmerritt@merrittfirm.com

BITMAN O'BRIEN & MORAT, PLLC

/s/ Ronnie Bitman

Ronnie Bitman (admitted *pro hac vice*)
615 Crescent Executive Ct., Suite 212
Lake Mary, Florida 32746
Telephone: 407.815.3110
E-mail: rbitman@bitman-law.com

Attorneys for Defendant Dr. Jane Ruby

CERTIFICATE OF SERVICE

I hereby certify that on this date the foregoing document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to the non-registered participants.

Date: July 10, 2023

/s/ R. Braxton Hill, IV
R. Braxton Hill, IV (VSB No. 41539)
MERRITTHILL, PLLC
919 E. Main Street, Suite 1000
Richmond, VA 23219
Telephone: 804.916.1600
E-mail: bhill@merrittfirm.com

Attorney for Defendant Dr. Jane Ruby